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Makic, Ravelo, Ramirez, Howard,
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Kashane Kirk, *et al.*,

Plaintiffs,

vs.

City of Phoenix, *et al.*,

Defendants.

Case No. CV 23-00836-MTL (CDB)

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
REPLY IN SUPPORT OF
DEFENDANTS' MOTION TO
DISMISS PURSUANT TO RULE
12(B)(6) & RULE 8(D)**

(Expedited Consideration Requested)

(First Request)

Defendants, by and through counsel undersigned respectfully stipulate and request the Court extend the deadline for Defendants to file their Reply in support of their Motion to Dismiss Pursuant to Rule 12(b)(6) and Rule 8(d) by two (2) business days from December 13 until December 17, 2024. This first requested extension to the deadline to file a Reply in support of Defendant's Motion to Dismiss is made in good faith and not for the purpose of delay. Pursuant to Local Rule of Civil Procedure 7.3(b), Plaintiffs do not oppose the requested extension.

1 On December 7, 2024, Plaintiffs filed their Response to Defendants' Motion to
2 Dismiss. (Docs. 64, 67.) Since then, undersigned counsel has worked diligently to prepare
3 the forthcoming Reply but requires some additional time due to multiple depositions (five
4 total) in another case running longer than anticipated, along with other case filings and
5 deadlines, and client meetings detracting from the amount of time he had to prepare the
6 Reply. Despite these additional time commitments, undersigned counsel devoted extra time
7 to complete the Reply, which is now nearly complete; however, undersigned counsel's
8 supervising attorney requires some additional time to review and finalize the forthcoming
9 Reply. His supervising attorney is currently boarding a flight back to Arizona and a brief
10 extension of two business days to review the Reply before it is filed because she will not
11 return home until later this evening.

12 For the foregoing reasons, Defendants respectfully request the deadline to file their
13 Reply in support of Defendants' Motion to Dismiss be extended to December 17, 2024. A
14 proposed order is filed simultaneously herewith.

15 RESPECTFULLY SUBMITTED this 13th day of December, 2024.

16 BROENING OBERG WOODS & WILSON, P.C.

17 By /s/ Jeremiah M. Sullivan

18 Sarah L. Barnes
19 Kelley M. Jancaitis
20 Jeremiah M. Sullivan
21 *Attorney for Defendants*
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CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2024, I electronically filed the foregoing with the Clerk's Office using the CM/ECF system for filing, and transmittal of a Notice of Electronic Filing to the following CM/ECF registrant:

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/s/ Suzanne Beard